

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

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KIRK CALDWELL
MAYOR



KATHY K. SOKUGAWA
ACTING DIRECTOR

EUGENE H. TAKAHASHI
DEPUTY DIRECTOR

December 12, 2020

2020/ELOG-2189(ZS)
2020/SMA-19

Ms. Stephanie Davis
Environmental Science International
354 Uluniu Street, Suite 304
Kailua, Hawaii 96734

Dear Ms. Davis:

**SUBJECT: Special Management Area (SMA) Use Permit (Major)
Hanohano Hale Replacement Wastewater Treatment System
53-549 Kamehameha Highway - Hauula
Tax Map Key 5-3-008: 001**

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This is in response to your letter, received on November 5, 2020, requesting to revise our recommendation that the subject replacement wastewater treatment system must be underground. We are pleased to inform you that we are amenable to revising our recommendation to allow an above-ground wastewater treatment system at an alternate location, as explained below.

On August 20, 2020, we transmitted our recommendation to the City Council that an SMA Use Permit for the replacement system be approved, with conditions. Condition A of the draft resolution required that the replacement system be underground, in order to mitigate visual impacts along the scenic coastal highway. On September 1, 2020, Resolution No. 20-226 was introduced to grant the SMA Use Permit. On October 7, 2020, the City Council granted a 120-day extension of time to provide an opportunity for our department and the Applicant to come to a consensus regarding the location of the replacement system.

You state that an underground system would be more likely to leak during flooding. An underground system would be below the base flood elevation. The groundwater table is three to four feet below the surface, so leaks could directly enter the groundwater, and groundwater could intrude into the treatment tank. You also state that an underground system would add to construction and maintenance costs.

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You state that existing underground wastewater systems along the coastline suffer from water intrusion at piping joints and cracks in the concrete or metal housing of tanks.

Projects that are subject to flooding can be designed to withstand flooding. These types of projects are routinely processed by our department. Such designs anticipate hydrostatic and hydrodynamic loads due to flooding, as well as buoyancy effects. The additional construction and maintenance costs associated with these measures do not typically factor into the decision-making process when it comes to imposing permit conditions to mitigate a project's negative impacts.

However, we have corresponded with State administrators who are familiar with these types of wastewater projects, and they are sympathetic to your concerns. The supervisor of the State Department of Health, Safe Drinking Water Branch Underground Injection Control Program, in particular, stated that site conditions could present complications if the treatment unit were placed underground. The low elevation and high groundwater table could necessitate use of an injection pump with an underground system, and the program supervisor stated her preference against this option. Therefore, we are willing to revise our recommendation to allow the system to be aboveground.

An aboveground system at the location you proposed in your application will have significant visual impacts, as discussed in our report. The following excerpt describes how an aboveground system would obstruct a view of the ocean from the scenic coastal highway:

"The proposed wastewater treatment unit is 24 feet long, 12 feet deep, and 14.5 feet high, and would be placed 10 feet from the highway in the middle of the view opening. The proposed blower enclosure is 11.5 feet high and the proposed emergency generator is nine feet high. The blower enclosure and generator would be placed on either side of the treatment unit and would also obstruct the view. The system would be enclosed with a six-foot-high, 73-foot-long screening wall or fence along the property line abutting the highway."

An alternate location between the building and the highway would significantly reduce visual impacts because it would not obstruct the view of the ocean. You argue that that location is not feasible because an access path would be restricted during construction, it would increase the risk of odor impacts to residents, and it would require the relocation of an emergency generator, an electrical transformer, several trees, utility lines, a trash enclosure, and a portable toilet.

We do not find this justification compelling. Although these issues may make it more difficult to site the wastewater system at the alternate location, they do not make it infeasible. Many construction projects involve temporary access restrictions and the relocation of trees, equipment, and utility lines. As stated in the environmental assessment, "any well operated wastewater plant will have a faint lingering earthy scent... but the proposed treatment system should not produce any strong odors." The trees could be relocated to the right-of-way in front of the wastewater system, or somewhere else on site, if that is not feasible.

We are willing to recommend to the City Council that our recommended Condition A of the resolution be revised to state:

"Construction must be in general conformity with the Project, as described in the DPP findings and recommendation, referenced above, and as depicted in Exhibits A through F, enclosed hereto and incorporated herein by reference. ~~The exception is that the Project must be an underground wastewater treatment system, instead of an aboveground system. Structural components must still be capable of resisting pressure from standing and flowing water, as well as the effects of buoyancy due to flooding.~~ In order to mitigate visual impacts, the aboveground components of the wastewater system must be developed in the alternate location between the building and the highway. Any change in the size or nature of the Project that has a significant effect on coastal resources addressed in ROH Chapter 25, HRS Chapter 205A, or any combination thereof, will require a new application. Any change that does not have a significant effect on coastal resources will be considered a minor modification and is therefore permitted under this resolution, upon review and approval by the Director of the DPP."

We also recommend that a new condition be imposed that states:

"The Applicant must provide the Department of Planning and Permitting with a landscape plan that mitigates visual impacts of the aboveground components of the wastewater treatment system, for review and approval."

Separately, your letter states that Hanohano Hale is pursuing shoreline protection measures, as high tides have been reaching the building. Please be aware that the City administration is increasingly averse to shoreline hardening, particularly in places where there are no existing seawalls and beach processes have not already been modified. It could be very difficult to justify a permit for shoreline protection at this location. In the absence of shoreline protection, the preferred means of adaptation to sea level rise is retreat. Please keep this in mind as this replacement wastewater system Project moves forward.

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Should you have any questions, please contact Zack Stoddard, of our Land Use Approval Branch, at (808) 768-8019 or zachary.stoddard@honolulu.gov.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kathy K. Sokugawa". The signature is fluid and cursive, with the first name "Kathy" being more prominent.

Kathy K. Sokugawa
Acting Director

cc: Chair Ron Menor,
Committee on Zoning, Planning and Housing